

1 SHAW VALENZA LLP
D. Gregory Valenza, Bar No. 161250
2 gvalenza@shawvalenza.com
Timothy L. Reed, Bar No. 258034
3 treed@shawvalenza.com
300 Montgomery Street, Suite 788
4 San Francisco, California 94104
Telephone: (415) 983-5960
5 Facsimile: (415) 983-5963

6 Attorneys for Defendants
Medical Hill Rehab Center, L.L.C. and Kindred
7 Healthcare Operating, Inc.

8 THE REVELATION LAW FIRM, P.C.
Melanie Popper, Bar No. 236279
9 mdp@revelationlaw.com
1001 Santa Clara Avenue, Suite A
10 Alameda, CA 94105
Telephone: (510) 665-4195
11 Facsimile: (415) 665-4197

12 Attorneys for Plaintiffs
Monique Matthews, Gabriel Oghwe, and Cynthia
13 Joiner

14
15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17

18 MONIQUE MATTHEWS, an individual,
GABRIEL OGHWE, an individual, and
19 CYNTHIA JOYNER, an individual,

20 Plaintiffs,

21 v.

22 MEDICAL HILL REHAB CENTER,
L.L.C., a corporation, KINDRED
23 HEALTHCARE OPERATING, INC., a
corporation,

24 Defendants.
25

Case No. CV 10-04371 BZ

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE MEDIATION
COMPLETION DATE**

26 The Parties hereto, Defendants MEDICAL HILL REHAB CENTER, L.L.C. and
27 KINDRED HEALTHCARE OPERATING, INC. ("Defendants"), and Plaintiffs MONIQUE
28 MATTEWS, GABRIEL OGHWE and CYNTHIA JOINER ("Plaintiffs"), by and through their

undersigned counsel, hereby stipulated and agree to this request for an order continuing the mediation completion date for this matter:

1. On April 18, 2011, the Court issued its Order Scheduling Jury Trial and Pretrial Matters. In that Order, the Court directed the Parties to conduct a mediation within 90 days, if possible. Accordingly, the mediation was to be completed by July 17, 2011.

2. The Parties originally scheduled mediation with Barbara S. Bryant, Esq. for July 13, 2011. However, due to scheduling conflicts and despite diligent efforts, the Parties and the Mediator agreed to continue the mediation to August 16, 2011.

3. Therefore, the Parties jointly request the July 17, 2011 mediation completion date be continued until August 16, 2011, or as soon thereafter as otherwise possible.

SO STIPULATED:

Dated: August 10, 2011

SHAW VALENZA LLP

By: /s/D. Gregory Valenza

D. Gregory Valenza
Timothy L. Reed
Attorneys for Defendants
Medical Hill Rehab Center, L.L.C. and
Kindred Healthcare Operating, Inc.

Dated: August 10, 2011

REVELATION LAW FIRM, P.C.

By: /s/Melanie Popper

Melanie Popper
Attorneys for Plaintiffs
Monique Matthews, Gabriel Oghwe and
Cynthia Joiner


186718.1.00133.038

ORDER

Pursuant to the Parties' Stipulation, and GOOD CAUSE APPEARING therefore:

IT IS HEREBY ORDERED that the mediation completion date in this matter be and is hereby CONTINUED to August 16, 2011.

DATED: August 15, 2011



Bernard Zimmerman
United States Magistrate Judge

186720.1.00133.038